

GEORGIA M. PESTANA *Corporation Counsel*

THE CITY OF NEW YORK LAW DEPARTMENT

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October 14, 2021

BY ECF

Honorable Mary Kay Vyskocil United States District Court Southern District of New York 500 Pearl Street, Room 2230 New York, New York 10007

Re: Stanley Taylor v. City of New York, et al. 17-CV-01424 (MKV)(SDA)

Dear Judge Vyskocil:

I am a Senior Counsel in the office of Georgia M. Pestana, Corporation Counsel of the City of New York, and attorney for defendants City of New York (Department of Sanitation) ("City" or "DSNY") and Nancy A. Reilly ("Reilly") (collectively, "Defendants") in the above-captioned action. I write on behalf of all parties and on consent of counsel for Plaintiff.

Pursuant to this Court's Order of August 13, 2021, the discovery end date in this case was extended to October 4, 2021 to allow Defendants to respond to Plaintiff's Notice to Produce dated May 27, 2021 and for the deposition of Defendant Reilly, which took place on September 29, 2021. The undersigned only received a copy of Ms. Reilly's deposition transcript yesterday and Plaintiff's counsel has expressed an intention to serve a discovery demand arising out of that testimony. In order to allow the parties to revise their Rule 56.1 Statements based on Ms. Reilly's testimony and to allow Plaintiff to pursue limited post-deposition discovery, the parties are requesting an adjournment of the Post-Discovery Conference of 21 days from October 21, 2021 to November 11, 2021. Defendants request a deadline of October 18, 2021 for Plaintiff to serve their demands, if any.

We thank you for your attention to this matter.

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| | Nicholas Schaefer | | | | | |
| Senior Counsel | | | | | | |
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Respectfully submitted.

cc: Arthur Z. Schwartz (Via ECF and E-mail)
Advocates for Justice, Chartered Attorneys
Attorneys for Plaintiff

This request for an adjournment and extension is GRANTED. The conference that was previously scheduled to take place on October 21 is ADJOURNED to Friday, November 12, 2021 at 11:30 AM.

Date: October 14, 2021
New York, New York

/ Mary Kay Wiskocil
United States District Judge